

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**JESSICA JONES, et al.,**

Plaintiffs,

v.

**VARSITY BRANDS, LLC, et al.**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**JURY DEMAND**

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**PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF CROSS-MOTION FOR SANCTIONS AGAINST DEFENDANTS AND COUNSEL**

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Plaintiffs Jessica Jones and Christina Lorenzen (“Plaintiffs”) move for leave to file a Reply brief in Support of their Cross-Motion for Sanctions against Defendants and Counsel (“Cross-Motion”), ECF No. 417. In support of this Motion, Plaintiffs assert as follows:

1. On March 9, 2023, Defendants filed their Motion for Sanctions under Rule 11 of the Federal Rules of Civil Procedure (“Motion for Sanctions”). The Motion for Sanctions argued that Plaintiffs lacked standing to bring claim relating to the relevant product market for cheer camps because the one class representative who had paid for Varsity cheer camps had been withdrawn. On that basis, Defendants sought sanctions including their fees and costs of bringing the motion and an order dismissing such claims. *Id.* at PageID 13483

2. On March 23, Plaintiffs filed their Cross Motion, arguing that Defendants’ Motion for Sanctions was frivolous.

3. On April 6, 2023, Defendants filed their Opposition to Plaintiffs’ Cross-Motion, arguing once again that Plaintiffs lacked standing to bring claims in the cheer camp market, and that therefore Defendants Motion for Sanctions was valid. The Opposition also attacks Plaintiffs’ Motion to Add Class Representative on the basis that it was untimely. The Opposition contains incorrect statements of the relevant law and facts. Plaintiffs ask for an opportunity to correct these misstatements.

4. Plaintiffs seek a short reply, of no more than five pages. A draft of the reply is attached hereto as Exhibit A.

For all of the above reasons, Plaintiffs believe that a reply would be helpful to the Court, because it will allow Plaintiffs to address the arguments made by Defendants to which Plaintiffs have not had an opportunity to respond.

Dated: April 13, 2023

Respectfully submitted,

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